

Jean L. Kiddoo  
Brett P. Ferenchak  
jean.kiddoo@bingham.com  
brett.ferenchak@bingham.com

February 14, 2014

**Via ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington, DC 20554

**Re: Onvoy, Inc. (Form 499 Filer Id 820189)**

**CPNI Compliance Certification for Calendar Year 2013  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Onvoy, Inc., and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's CPNI Certification for calendar year 2013.

Respectfully submitted,

/s/ *Brett P. Ferenchak*

Jean L. Kiddoo  
Brett P. Ferenchak

Counsel for Onvoy, Inc.

Enclosure

Beijing  
Boston  
Frankfurt  
Hartford  
Hong Kong  
London  
Los Angeles  
New York  
Orange County  
San Francisco  
Santa Monica  
Silicon Valley  
Tokyo  
**Washington**

Bingham McCutchen LLP  
2020 K Street NW  
Washington, DC  
20006-1806

T +1.202.373.6000  
F +1.202.373.6001  
bingham.com

**Annual 47 C.F.R § 64.2009 (e) CPNI Certification**  
**EB DOCKET 06-36**

**Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013**

**Date Filed:** February 12, 2014

**Name of company covered by this certification:** Onvoy, Inc.

**Form 499 Filer ID:** 820189

**Name of signatory:** Scott E. Beer

**Title of signatory:** General Counsel and Secretary

**Certification:**

I, Scott E. Beer, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed \_\_\_\_\_

Scott E. Beer, General Counsel and Secretary

Attachment: Accompanying Statement explaining CPNI procedures

## **ONVOY, INC**

### **STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES**

Onvoy, Inc. (Onvoy) is a regional telecommunications provider that primarily provides wholesale services to other carriers such as wholesale long distance, signaling system seven (SS7) services and operator and directory services. Onvoy is also an alternative tandem provider and sells retail long distance services.

Onvoy does not use or permit access to CPNI to market any services outside of the "total services approach" as specified in 47 CFR §64.2005. Nor does the Company allow affiliates or third party access to CPNI for marketing-related purposes.

Consistent with the Commission's rules, Onvoy uses, discloses and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of Onvoy, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

Onvoy has designated a CPNI Compliance Officer who is responsible for: (1) communicating with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of Company employees and agents who use or have access to CPNI; (3) supervising the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintaining records regarding the use of CPNI in marketing campaigns; and (5) receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

Onvoy has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, Onvoy will notify affected customers. Onvoy will maintain a record of any CPNI-related breaches for a period of at least two years.

Onvoy provides training concerning CPNI procedures. All employees of Onvoy are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by the Company. Employees of Onvoy who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

Onvoy discloses or releases call detail information to customers during customer-initiated telephone contacts only when the customer provides a pre-established password. If the customer does not provide a password, call detail information is released only by sending it to the customer's address of record or by the carrier calling the customer at the telephone number of

record.

Onvoy permits customers to establish online accounts, but requires that an appropriate password be furnished by the customer before he or she can access any CPNI in his or her online account. Passwords may not be based upon readily obtainable biographical information or account information.

Onvoy has adopted a policy that it does not and will not use, disclose or permit access to CPNI in connection with Company-initiated marketing of services to which a customer does not already subscribe from the Company.